

CDFA comments on the Early Agency Review draft Supplement to the Main Document PEIS/EIR and Appendix A - ENVIRONMENTAL CONSEQUENCES OF THE DRAFT PREFERRED PROGRAM ALTERNATIVE WITH NEW OPERATING CRITERIA, September 30, 1998:

Page 5-30 - Policy Declarations - There is an agricultural resources mitigation policy declaration being developed that should be rolled out to the Policy Group at the 10/15 meeting. When finalized, it should be included just above the declaration on Agricultural Land Conversion in the Delta. The two policy declarations on agricultural land conversion may need modification to be consistent with the agricultural resources mitigation policy.

Page 6-3 - Surface Water Resources - Ecosystem Restoration - A range of water supply impacts (e.g. 300,000 to 600,000 ac-ft/yr in average years) should be presented here.

Page 6-5 to 6-7 - Surface Water Resources - Storage and Conveyance - A range of water supply benefits should be presented (e.g. 0 - 1.3 MAF/yr. in an average year) in this section.

Page 6-12 - Air Quality - Ecosystem Restoration - Extensive development of wetlands habitat could result in increased methane emissions from the anaerobic decomposition of wetlands associated biomass.

Page 6-12 - Air Quality - Water Quality - Land retirement for selenium source reduction could result in increased dust emissions due to wind blowing on exposed soils.

Page 6-43 - Operation Model Demands - The two Consumptive Use tables do not include environmental water use - water applied to wetlands and other habitat, for 1995 or projected for 2020. This demand could be about the same as urban demand. If flow requirements are factored in, it could be even greater.

Page 8-9 - Revised Table 8.1-1 - Agricultural Land and Water Use - Other Programs - As now analyzed, the ERP could create a water demand for habitat in the range of 196,800 to 280,800 ac-ft/yr in the delta. The ERP also contains environmental flow requirements that embody additional water. The potential adverse impact to agricultural water supplies associated with these actions needs to be stated in this summary table.

General comment: The page number of the main document where each Table or other reference can be found should be mentioned for the convenience of the reader.

Page A-1 - third paragraph - Under CEQA, one of the purposes of preparing a programmatic EIR is to "(a)llow the Lead Agency to consider broad policy alternatives and program wide mitigation measures at an early time when the agency has greater

flexibility to deal with basic problems or cumulative impacts..." (sec. 15168 (b)(4) of the CEQA Guidelines). This paragraph is inadequate. It is my understanding that by the next Policy Group meeting (Oct. 15-16), a mitigation policy statement will be offered for consideration of the group. If and when approved, it should be incorporated into the document.

Bay-Delta Hydrodynamics and Riverine Hydraulics

Page A-2 - third paragraph - "The results suggest that the ERP Delta outflow targets could substantially affect stream flows and exports." An attempt should be made to put numerical boundaries on these effects in terms of acre-feet per type of water year.

Page A-7 - top of page - "Conversion of cultivated land to wetlands could significantly increase evaporative losses." This conversion could also increase in-stream diversions of water in order to maintain the wetlands. This potential impact should also be mentioned.

Water Supply and Water Management

Page A-25 - Delta Region - Ecosystem Restoration - It should be noted here (as on page A-94) that increased water demand resulting from conversion of Delta agricultural land to wetlands will adversely impact agricultural water supplies.

Page A-29 - San Joaquin Region - Ecosystem Restoration - Since most agricultural land conversion to wetlands is proposed in or north of the Delta, resulting in increased water demand in those regions, the potential result could be reduced water supplies available for pumping to water users south of the Delta. The agricultural land conversion impacts would be felt in and north of the Delta, but the agricultural (and urban) water supply impacts would be felt in the export regions.

Groundwater Resources

Page A-32- Delta Region - Ecosystem restoration - The statement that, "A reduction in groundwater pumping would provide a potentially significant benefit to the reduction in pumping-induced subsidence." is not supported by the findings of the Subsidence Sub-Team report of September 24, 1998 (pages 3-4, 6). The word significant should be replaced with the word minor, and the statement qualified that benefits would be site specific.

Page A-34 - Sacramento River Region - Ecosystem Restoration - It is also possible that increased groundwater pumping to supply water for habitat created under the ERP may result. This impact should be noted.

Page A-39 - San Joaquin River Region - Ecosystem Restoration - Increased water demand from the ERP may also reduce water availability for conjunctive use/groundwater recharge projects in this region.

Geology and Soils

Page A-48 - Sacramento River and San Joaquin River Regions - Water Quality - One element of the water quality program in the San Joaquin River region is the retirement of up to 37,400 acres of drainage impaired agricultural land to reduce selenium and salt loadings to the San Joaquin River. This land retirement could result in increased soil erosion due to wind and uncontrolled runoff, depending on how the land is managed.

Air Quality

Page A-58 - Delta Region - Ecosystem Restoration - Significantly increasing wetland vegetation could result in a continuous increase in methane gas emissions due to the natural anaerobic decay of the associated vegetation.

Air emissions from operation of diesel and gasoline powered equipment include ozone precursors (NMOG or VOC, NO_x), fine particulate matter - PM₁₀ (different than fugitive dust), CO, and toxic air contaminants.

Fisheries and Aquatic Ecosystems

Vegetation and Wildlife

Page A-79 - Delta Region - Water Use Efficiency - The third paragraph should be removed as it is unrelated to the Water Use Efficiency Program and often inaccurate. Land fallowing may be an adverse impact related to the waters transfers program, not the Water Use Efficiency Program. Conversion of rice and pasture land to vineyards or orchards is not (and would not be) a result of the Water Use Efficiency Program, it is a result of perceived market opportunities.

Page A-85 - San Joaquin River and Sacramento River Regions - Water Use Efficiency - The second paragraph should be removed as it has nothing to do with impacts on vegetation and wildlife by this program in these regions.

Agricultural Land and Water Use

Page A-96-97 - Sacramento River and San Joaquin River Regions - Ecosystem Restoration - The second paragraph states that, "Habitat restoration in [these regions] may not require as much additional water per acre of habitat as the Delta Region, because much of the floodplain and meander corridor vegetation would be sustained by soil moisture and shallow groundwater storage resulting from rainfall and storm flows." This statement may be true for the Sacramento Valley, but certainly not true for the San Joaquin Valley. There is significantly less rainfall in the San Joaquin Valley, in general groundwater is in chronic overdraft, and stormflows are much less frequent. Furthermore, ET is higher, thus it is likely that water-dependent habitat in the San Joaquin Valley will require more water than similar habitat in the Delta.

Page A-97 - Water Quality - second paragraph - The assumption of 3 ac-ft/ac of applied water that may be applied if 45,000 acres of drainage impaired land are retired may be an overstatement. This land would most likely receive a Class I or II CVP water allocation

(2.5 or 1.25 ac-ft/ac). Groundwater may, or may not provide additional supply. This is not discussed under Water Quality in the Delta Region section, as referenced here.

Page A-99 - Mitigation Strategies - Avoidance or minimization strategies could include but are not limited to:

Page A-101 - the last mitigation bullet is applicable to all CALFED actions, not just to the Levee Program.

Page A-101 - Potentially Significant Unavoidable Impacts - Potentially significant agricultural water supply impacts, over and above those embodied in land conversion (i.e. increased water demand for wetlands habitat) have been identified and should be stated here.

Agricultural Economics

Page A-101-A102 - Delta Region - Ecosystem Restoration - The impacts on agricultural gross revenues is underestimated. Most likely, field crops would be encouraged since their feed and habitat value for wildlife is more beneficial than vines, orchards, and vegetables. These higher gross value crops would be most likely to be the target of habitat development (particularly vegetable acreage, since this land would be easier to convert than land with permanent crops). In San Joaquin Co., the number 5 agricultural county in California, the top agricultural crops were grapes, almonds, tomatoes, asparagus, cherries, and hay. The county is also a significant producer of sweet corn and potatoes. Each of these vegetable crops has a gross value per acre of \$2,000 to \$8,000 per acre. The orchard crops each has a value of over \$2,000 per acre. Dairy is the second ranked commodity in the county, dependent on locally grown feed. Even lower grossing hay and grains are used to support a high value agricultural product - milk.

Page A-108 - Potentially Significant Unavoidable Impacts - Potentially significant agricultural water supply impacts, over and above those embodied in land conversion (i.e. increased water demand for wetlands habitat) have been identified and should be stated here.

General comment on mitigation of agricultural land, water, social, and economic impacts: A CALFED policy statement concerning agricultural impacts mitigation is under development. Once approved, CDFA welcomes the opportunity to work with CALFED staff and agency representatives to further refine potential mitigation actions, develop a mitigation framework and process to support the policy declaration, and further develop the mitigation monitoring plan. CDFA considers the lists of potential mitigation measures for agricultural resource, social, and economic impacts to be suggestive, and not all inclusive in addressing agricultural impacts.

Power Production and Energy

Page A-149 The energy savings due to conversion of agricultural land to habitat described in the second paragraph would not occur on those lands where habitat is

actively managed. Activities such as grading, tilling, planting, water pumping, weed and other vegetation management, and harvesting may all take place.

Regional Economics

Page A-155 - Delta Region - ERP - See comment for page A-101 above.

Visual Resources

Page A-169 Delta Region - ERP - There are many, many people who would disagree with and be offended by the statement that, "...natural habitats generally are perceived to be more scenically diverse and aesthetically pleasing than agricultural lands or lands used for other purposes."

Page A-169 - Water Use Efficiency Program - Land fallowing could result in wind erosion and blowing dust, causing visual impairment, that could even be hazardous.

Environmental Justice

Page A-176 - Ecosystem Restoration - As stated on page A-177, the first sentence under storage and conveyance, "The conversion of agricultural soils could disproportionately affect minority and low-income populations, including migrant agricultural workers." This statement most certainly applies to the ERP, and should be included.